

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)

Denise Carlon, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
[dcarlon@kmlawgroup.com](mailto:dcarlon@kmlawgroup.com)  
Attorneys for Movant  
MidFirst Bank

In Re:  
Thaddus L. Adams,  
  
Debtor



Order Filed on July 26, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Case No.: 22-18731 CMG

Hearing Date:

Judge: Christine M. Gravelle

### CONSENT ORDER CURING POST-PETITION ARRARS

The relief set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED.**

**DATED: July 26, 2023**

  
\_\_\_\_\_  
Honorable Christine M. Gravelle  
United States Bankruptcy Judge

**(Page 2)**

Debtor: Thaddus L. Adams,

Case No: 22-18731 CMG

Caption of Order: CONSENT ORDER CURING POST-PETITION ARREARS

---

This matter having been brought before the Court by KML Law Group, P.C., attorneys for Secured Creditor, MidFirst Bank, Denise Carlon, Esq. appearing, upon a consent order curing post-petition arrears for real property located at 302 Ashmore Avenue, Trenton NJ 08611-3680, and this Court having considered the representations of attorneys for Secured Creditor and John Zimnis, Esq., attorney for Debtor, and for good cause having been shown;

It is **ORDERED, ADJUDGED and DECREED** that as of July 7, 2023, Debtor is in arrears outside of the Chapter 13 Plan to Secured Creditor for payments due December 2022 through July 2023 for a total post-petition default of \$7,201.92 (8 @ \$900.24); and

It is further **ORDERED, ADJUDGED and DECREED** that the balance of the arrears in the amount of \$7,201.92 shall be added to the affidavit of amount due and paid through Debtors' Chapter 13 plan; and

It is further **ORDERED, ADJUDGED and DECREED** that regular mortgage payments are to resume August 1, 2023, directly to Secured Creditor (Note: the amount of the monthly mortgage payment is subject to change according to the terms of the note and mortgage); and

It is further **ORDERED, ADJUDGED and DECREED** that for the Duration of Debtor's Chapter 13 bankruptcy proceeding, if the lump sum payment or any regular monthly mortgage payments are not made within thirty (30) days of the date said payment is due, Secured Creditor may obtain an Order Vacating Automatic Stay as to Real Property by submitting a Certification of Default to the Court indicating such payment is more than thirty days late, and Debtors shall have fourteen days to respond; and

It is further **ORDERED, ADJUDGED and DECREED** that a copy of any such application, supporting certification, and proposed Order must be served on the Trustee, Debtor, and Debtor's counsel at the time of submission to the Court; and

**(Page 3)**

Debtor: Thaddus L. Adams,

Case No: 22-18731 CMG

Caption of Order: CONSENT ORDER CURING POST-PETITION ARREARS

---

It is further **ORDERED, ADJUDGED and DECREED** that Secured Creditor is hereby awarded reimbursement of fees and costs in the sum of \$500.00 for attorneys' fees which is to be paid through Debtors' Chapter 13 plan.

I hereby agree and consent to the above terms and conditions:

Dated:

/s/ Denise Carlon, Esquire

7/7/2023

DENISE CARLON, ESQ.

ATTORNEY FOR SECURED CREDITOR

I hereby agree and consent to the above terms and conditions:

Dated:

/s/ John Zimnis, Esquire

7/17/2023

John Zimnis, ESQ.

ATTORNEY FOR DEBTOR